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16 *Attorneys for Defendants*

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

20 REARDEN LLC, *et al.*,

21 v.  
 22 Plaintiffs,

23 TWDC ENTERPRISES 18 CORP. f/k/a THE  
 24 WALT DISNEY COMPANY, a Delaware  
 corporation, *et al.*,

25 v.  
 26 Defendants.

Case No. 4:22-cv-02464-JST

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING OPPOSITION  
 AND REPLY BRIEFING DATES ON  
 DEFENDANTS' MOTION TO DISMISS  
 IN PART PLAINTIFFS' FIFTH  
 AMENDED COMPLAINT [DKT. 94]**

Hearing Date: May 22, 2025  
 Time: 2:00 p.m.  
 Crtrm.: 6 (2<sup>nd</sup> Floor)

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Case No. 4:22-cv-02464-JST

STIPULATION AND [PROPOSED] ORDER REGARDING OPPOSITION AND REPLY BRIEFING DATES ON  
 DEFENDANTS' MOTION TO DISMISS IN PART PLAINTIFFS' FIFTH AMENDED COMPLAINT

## STIPULATION

Plaintiffs Rearden LLC and Rearden Mova LLC (collectively, “Plaintiffs”) and Defendants TWDC Enterprises 18 Corp., Disney Studio Production Services Co., LLC, Walt Disney Pictures, Marvel Studios LLC, MVL Film Finance LLC, and Lucasfilm Ltd. LLC (collectively, “Defendants”) (Plaintiffs and Defendants jointly the “Parties”), by and through their respective counsel of record, stipulate as follows:

1. Plaintiffs filed their complaint on April 21, 2022 (Dkt. 1), and a corrected/first amended complaint on June 9, 2022 (Dkt. 15);

9           2. Pursuant to the Court's Order (Dkt. 32) on the Parties' joint administrative motion  
10 (Dkt. 24), Defendants filed a motion to dismiss the corrected/first amended complaint on  
11 August 9, 2022 (Dkt. 34);

12       3. Pursuant to the Court’s Order (Dkt. 39) on the Parties’ joint administrative motion  
13 and stipulation (Dkt. 37), Plaintiffs filed a second amended complaint on September 26, 2022  
14 (Dkt. 38), and Defendants filed a motion to dismiss the second amended complaint on October 24,  
15 2022 (Dkt. 42);

16 4. On February 21, 2023, the Court granted Defendants' motion to dismiss with leave  
17 to file a third amended complaint by March 14, 2023 (Dkt. 54);

18 5. On May 24, 2023, Plaintiffs filed their third amended complaint (Dkt. 64); and  
19 Defendants moved to dismiss on July 7, 2023 (Dkt. 68);

20       6.       On March 21, 2024, the Court granted Defendants' motion to dismiss Plaintiffs'  
21 copyright infringement claims with leave to amend and denied the motion to dismiss the patent  
22 infringement claims (Dkt. 76);

23 7. On April 11, 2024, Plaintiffs filed their Fourth Amended Complaint (Dkt. 77);

24 8. On April 18, 2024, the Parties stipulated to extend Defendants' deadline for filing a  
25 motion to dismiss the Fourth Amended Complaint to May 16, 2024 (Dkt. 78);

26 9. On May 16, 2024, Defendants filed their motion to dismiss the fourth amended  
27 complaint, and noticed the motion for hearing on August 1, 2024 (Dkt. 80);

1       10. On December 20, 2024, the Court granted Defendants' motion to dismiss Plaintiffs'  
 2 secondary infringement allegations in their copyright infringement claims with leave to amend and  
 3 denied the motion to dismiss the direct infringement allegations in their copyright infringement  
 4 claims (Dkt. 87);

5       11. On January 24, 2025, Plaintiffs filed their Fifth Amended Complaint (Dkt. 90);

6       12. On March 3, 2025, Defendants filed their motion to dismiss in part the fifth  
 7 amended complaint, and noticed the motion for hearing on May 22, 2025 (Dkt. 94);

8       13. Plaintiffs have requested, and Defendants have agreed, to extend the time for  
 9 Plaintiffs to file an opposition to Defendants' motion to dismiss in part the Fifth Amended  
 10 Complaint, provided that Defendants have the additional time to file their reply set forth below.  
 11 Accordingly, the Parties have agreed to the proposed request on these matters set forth in the next  
 12 paragraph.

13       THEREFORE, the Parties respectfully request that the Court issue an Order granting this  
 14 stipulation, and providing that the deadline for Plaintiffs to file their opposition to Defendants'  
 15 motion to dismiss in part the Fifth Amended Complaint be extended from March 17, 2025 to  
 16 April 8, 2025 and the deadline for Defendants to file their reply in support of their motion to  
 17 dismiss in part the Fifth Amended Complaint be extended to May 8, 2025 (the reply otherwise  
 18 would be due March 24 if the opposition were to be filed on March 17); and that the hearing date  
 19 remain May 22, 2025, or as soon thereafter as it may be heard.

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21 **IT IS SO STIPULATED.**

23 Dated: March 13, 2025

**HALEY GUILIANO LLP**

JOSHUA M. MASUR  
 BRIAN J. BECK

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By: /s/ Brian J. Beck

Brian J. Beck  
 Attorneys for Plaintiffs

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1 Dated: March 13, 2025

2 **MUNGER, TOLLES & OLSON LLP**3 By: /s/ John L. Schwab

4 John L. Schwab

5 Attorneys for Defendants

6 **CIVIL LOCAL RULE 5-1 ATTESTATION**7 I, Brian J. Beck, am the ECF user whose credentials were utilized in the electronic filing of  
8 this document. In accordance with Civil Local Rule 5-1(i)(3), I hereby attest that John L. Schwab  
9 concurred in the filing of this document.10 /s/ Brian J. Beck

11 Brian J. Beck

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13 **[PROPOSED] ORDER**14 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**15 Plaintiffs' opposition to Defendants' motion to dismiss in part the Fifth Amended  
16 Complaint shall be filed on or before April 8, 2025.17 Defendants' reply in support of their motion to dismiss in part the Fifth Amended  
18 Complaint shall be filed on or before May 8, 2025.

19 The hearing on Defendants' motion to dismiss shall remain May 22, 2025.

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21 DATED: \_\_\_\_\_, 2025

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23 HON. JON S. TIGAR

24 United States District Judge

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